



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption is in Compliance with D.N.J.L.BR. 9004-1

Lavin, Cedrone, Graver, Boyd & DiSipio

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Mt. Laurel, New Jersey 08054

Regina Cohen, Esquire

Attorneys for Ally Capital

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Order Filed on July 27, 2021  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

*In Re:*

LORI K. VALENTINE

Debtor

Case No.: 19-16657(ABA)

Hearing Date: N/A

Judge: Andrew B. Altenburg Jr.

Chapter: 13

**CONSENT ORDER RESOLVING  
CREDITOR, ALLY CAPITAL'S MOTION FOR RELIEF FROM STAY**

The relief set forth on the following page, numbered two (2) through four (4) is hereby ORDERED.

**DATED: July 27, 2021**



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Honorable Andrew B. Altenburg, Jr.  
United States Bankruptcy Court

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Debtor: Lori K. Valentine

Case No.: 19-16657(ABA)

Caption of Order: CONSENT ORDER RESOLVING CREDITOR, ALLY CAPITAL'S  
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This Consent Order is entered into by and between the Debtor Lori K. Valentine, by and through her counsel, Andrew Thomas Archer, Esquire, and the Law Offices of Brenner Spiller & Archer and Ally Capital, by and through its counsel, Regina Cohen, Esquire and the Law Offices of Lavin, Cedrone, Graver, Boyd & Disipio, in order to resolve Ally Capital's Motion for Relief from Stay filed with this Court on June 28, 2021.

Lori Valentine (the "Debtor") financed the purchase of a 2013 Chevrolet Equinox, VIN: 2GNALBEK7D6257257 (the "Vehicle") pursuant to the terms of a Retail Installment Sale Contract dated June 21, 2016 (the "Contract") which has been assigned to Ally Capital.

Pursuant to the Contract, Ally Capital maintains a perfected security interest in and to: (a) the Vehicle; (b) accessories, equipment and replacement parts installed in the Vehicle; and (c) service contracts on the Vehicle.

The Debtor desires to retain possession of the Vehicle and provide adequate protection for Ally Capital's interest in the Vehicle.

It is hereby stipulated and agreed by and between Debtor and Ally Capital as follows:

**ORDERED** that the Debtor is \$4,410.78 in arrears through and including the July 10, 2021 due payment. The Debtor acknowledges her account is in arrears in the amount of \$4,410.78 through and including the July 10, 2021 due payment.

**ORDERED** that the Debtor is paying the arrears in the amount of \$4,410.78 along with \$500.00 attorney fees and costs through the Chapter 13 Plan for a total payment of \$4,910.78. Debtor shall amend her plan within thirty (30) days to include this amount.

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Debtor: Lori K. Valentine

Case No.: 19-16657(ABA)

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**ORDERED** that the Debtor shall resume making regular monthly contractual payments in the amount of \$269.31 each, commencing with the payment due on or before August 10, 2021. Pursuant to the Contract, a late charge may be assessed for any payment not received in full within ten (10) days after it is due. Said payments shall be forwarded to: Ally Capital, Payment Processing Center, P.O. Box 78234, Phoenix, AZ 85062-8234.

**ORDERED** that all payments shall be made payable to Ally and include Debtor's account number.

**ORDERED** that the Debtor hereby agrees to maintain insurance coverage in such types and amounts as are required by the Contract until such time as all amounts due Ally under the Contract are paid in full.

**ORDERED** if Debtor fails to comply with any of the stipulated terms herein, or if Debtor fails to make payments within ten (10) days of due date, or if Debtor fails to make trustee payments when due, Ally will give Debtor and Debtor's counsel notice by facsimile, first class mail or e-mail. Debtor will have ten (10) days to bring the account current. If the account is not brought current within the ten (10) day period, Ally Capital may be granted relief from the automatic stay imposed by 11 U.S.C. §362 with respect to the Vehicle as to the Debtor as to the vehicle upon filing a Certification of Counsel that Debtor is in default, together with a proposed Order to the Bankruptcy Court, and serving copies of the same upon the Debtor, Debtor's counsel and Chapter 13 Trustee. It is also expressly understood that the notice and cure period provided herein, only applies with respect to Ally Capital's ability to obtain relief from the automatic stay in this bankruptcy case and does not in any way apply to or restrict Ally Capital's ability to pursue its rights pursuant to the Contract.

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Debtor: Lori K. Valentine

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**ORDERED** that if for any reason Debtor(s)' case is closed, terminated, dismissed or converted, the parties hereto agree and acknowledge that the terms of this agreed/stipulated order will be null and void and the parties are returned to the status quo with their respective rights under state law and the Contract.

**ORDERED** that this Consent Order may be executed by facsimile and such facsimile signatures shall be deemed as originals.

**ORDERED** that the signature pages of this Consent Order may be executed in counterpart and all such signature pages, when attached, shall become part of the original Consent Order.

/s/ Regina Cohen  
Regina Cohen, Esquire  
Attorney for Ally Capital

  
Andrew Thomas Archer, Esquire  
Attorney for Debtor

In re:  
Lori K Valentine  
Debtor

Case No. 19-16657-ABA  
Chapter 13

District/off: 0312-1  
Date Rcvd: Jul 27, 2021

User: admin  
Form ID: pdf903

Page 1 of 2  
Total Noticed: 2

The following symbols are used throughout this certificate:

**Symbol** **Definition**

- + Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

**Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 29, 2021:**

Recip ID	Recipient Name and Address
db	+ Lori K Valentine, 52 Indian Trail Road, Cape May Court House, NJ 08210-2609
aty	+ Robert M Anderson, Escandon, Fernicola, Anderson, 301 Main Street, 2nd Floor, Suite 3, Allenhurst, NJ 07711-1017

TOTAL: 2

**Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.**  
Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI).

NONE

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

NONE

## NOTICE CERTIFICATION

I, Joseph Speetjens, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

**Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.**

Date: Jul 29, 2021

Signature: /s/Joseph Speetjens

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## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on July 27, 2021 at the address(es) listed below:

Name	Email Address
Andrew Thomas Archer	on behalf of Debtor Lori K Valentine aarcher@spillerarcherlaw.com bankruptcy@brennerlawoffice.com;mcdocherty_187750@ecf.courtdrive.com;R64966@notify.bestcase.com
Denise E. Carlon	on behalf of Creditor Bayview Loan Servicing LLC, a Delaware Limited Liability Company dcarlon@kmllawgroup.com, bkgroup@kmllawgroup.com
Farha Ahmed	on behalf of Creditor Wilmington Savings Fund Society FSB Owner Trustee of the Residential Credit Opportunities Trust V-B farha@dwaldmanlaw.com
Isabel C. Balboa	ecfmail@standingtrustee.com summarymail@standingtrustee.com
Isabel C. Balboa	on behalf of Trustee Isabel C. Balboa ecfmail@standingtrustee.com summarymail@standingtrustee.com

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Kevin Gordon McDonald

on behalf of Creditor Bayview Loan Servicing LLC, a Delaware Limited Liability Company kmcdonald@kmllawgroup.com, bkgroup@kmllawgroup.com

Regina Cohen

on behalf of Creditor Ally Capital rcohen@lavin-law.com ksweeney@lavin-law.com

U.S. Trustee

USTPRegion03.NE.ECF@usdoj.gov

TOTAL: 8